

The Honorable Robert S. Lasnik

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STATE OF WASHINGTON, et al.,

NO. 2:18-cv-01115-RSL

Plaintiffs,

V.

UNITED STATES DEPARTMENT OF  
STATE, et al.,

**STIPULATION TO EXTEND  
DEADLINE TO FILE DISCOVERY-  
RELATED MOTIONS**

**NOTING DATE: NOVEMBER 6, 2018**

### Defendants.

Pursuant to Local Rules 7(d)(1) and 10(g), the Plaintiff States and the Private Defendants<sup>1</sup> hereby file this stipulated request to extend the deadline to file motions related to discovery disputes until 21 days after the Court rules on the Private Defendants' pending Motion for Judgment on the Pleadings. The grounds for this stipulation are as follows:

1. The current deadline to file motions related to discovery disputes is November 15, 2018. Dkt. # 115 (Case Management Order), p. 2.

2. On September 20, 2018, the Plaintiff States propounded a set of discovery requests on the Private Defendants.

3. On October 11, 2018, the Private Defendants filed a Motion for Judgment on the

<sup>1</sup> The Private Defendants are Defense Distributed, the Second Amendment Foundation, and Conn Williamson. The Federal Defendants do not oppose the relief requested in this stipulation.

1 Pleadings, seeking an order “dismissing them from this action.” Dkt. # 114. As of the filing of  
2 this stipulation, the motion has been fully briefed but has not been ruled upon.

3 4. On October 22, 2018, the Private Defendants responded to the Plaintiff States’  
4 discovery requests, objecting on the grounds *inter alia* that their Motion for Judgment on the  
5 Pleadings was pending, and that they would not be subject to party discovery if the motion were  
6 granted.

7 5. The Plaintiff States and the Private Defendants agree that, if the Motion for  
8 Judgment on the Pleadings were to be granted in full, the Private Defendants would not be subject  
9 to party discovery. They further agree that postponing their efforts to resolve any discovery  
10 disputes until after the Court has ruled on the motion will conserve the parties’ resources and  
11 avoid any need to seek provisional relief in keeping with the current deadline without the benefit  
12 of a ruling on the motion.

13 Based on the above, the Plaintiff States and the Private Defendants jointly request that  
14 the Court extend the deadline to file discovery-related motions to 21 days after the Court issues  
15 a ruling on the Motion for Judgment on the Pleadings.

16 DATED this 6th day of November, 2018.

17 ROBERT W. FERGUSON  
18 Attorney General

19 /s/ Jeffrey Rupert  
20 JEFFREY RUPERT, WSBA #45037  
Division Chief  
21 KRISTIN BENESKI, WSBA #45478  
Assistant Attorney General  
TODD BOWERS, WSBA #25274  
22 Deputy Attorney General  
JEFF SPRUNG, WSBA #23607  
Assistant Attorney General  
ZACH JONES, WSBA #44557  
23 Assistant Attorney General  
24

1 JeffreyR2@atg.wa.gov  
2 KristinB1@atg.wa.gov  
3 ToddB@atg.wa.gov  
JeffS2@atg.wa.gov  
ZachJ@atg.wa.gov  
*Counsel for the Plaintiff States*

4  
5 IMMIX LAW GROUP PC  
6 /s/ Joel B. Ard  
Joel B. Ard, WSBA #40104  
7 Immix Law Group PC  
8 701 5th Ave Suite 4710  
Seattle, WA 98104  
Phone: (206) 492-7531  
Fax: (503) 802-5351  
joel.ard@immixlaw.com  
*Counsel for the Private Defendants*

10 FARHANG & MEDCOFF  
11 /s/ Matthew Goldstein  
Matthew Goldstein\*  
12 Farhang & Medcoff  
13 4801 E. Broadway Blvd., Suite 311  
Tucson, AZ 85711  
Phone: (202) 550-0040  
mgoldstein@fmlaw.law  
\*Admitted pro hac vice  
*Counsel for the Private Defendants*

14  
15 BECK REDDEN LLP  
16 /s/ Charles Flores  
Charles Flores\*  
17 Beck Redden LLP  
18 1221 McKinney Street, Suite 4500  
Houston, TX 77010  
Phone: (713) 951-3700  
cflores@beckredden.com  
\*Admitted pro hac vice  
*Counsel for Defendant Defense Distributed*

**PROPOSED  
ORDER APPROVING STIPULATION**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: \_\_\_\_\_

---

Honorable Robert S. Lasnik  
United States District Judge

## **DECLARATION OF SERVICE**

I hereby certify that on November 6, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will serve a copy of this document upon all counsel of record.

DATED this 6th day of November, 2018, at Seattle, Washington.

/s/ Morgan Mills  
MORGAN MILLS, Legal Assistant